

**THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Royce J. Hassell

Debtor.

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Case No. 19-30694

(Chapter 11)

**DECLARATION OF ERIN E. JONES IN SUPPORT OF THE DEBTOR'S
APPLICATION TO EMPLOY JONES MURRAY & BEATTY LLP**

I, Erin E. Jones, declare and state under penalty of perjury as follows:

1. I am a partner of the law firm Jones Murray & Beatty LLP (“JMB” or “Firm”) with offices at 4119 Montrose Blvd., Ste. 230, Houston, TX 77006.

2. I am an attorney licensed to practice in the State of Texas with bar card number 24032478 and in the United States District and Bankruptcy Courts for the Southern District of Texas with SDOT number FED ID: 34157

3. JMB and its partners have broad experience in bankruptcy law. JMB regularly represents debtors, trustees, creditors and other parties in interest in the Southern District of Texas. JMB is well qualified to represent the Debtor in this case.

4. I caused JMB to conduct a conflict check against the names of the Debtor, all creditors and other parties-in-interest appearing on the mailing matrix, the schedules and statement of financial affairs, their respective attorneys and accountants, the United States Trustee and all persons employed in the office of the United States Trustee.

5. Except as stated below, the Firm has no connection to any of those parties:

6. As attorneys in this District, JMB’s partners have regular professional interactions with other attorneys in the community. Those interactions are not related to this case.

7. Several of the creditors in this case provide consumer credit or services to the public at large. JMB and its personnel have a variety of arms’ length connections with these creditors in their

capacities as consumers. None of these connections is related to this case. Several of the creditors in this case also appear as creditors in other cases where JMB may represent or has represented other creditors, the debtors or other parties in interest. None of those engagements are related to this case.

8. JMB does not have a pre-petition claim against the Debtor.

9. Based on the foregoing diligence, I believe the firm is a “disinterested person” as that term is defined in the Bankruptcy Code. JMB neither holds nor represents any interest adverse to the Trustee of the estate.

10. If the firm learns of a conflict or connection in the future, it will disclose such conflict or connection to the Court and take all appropriate action.

11. The firm has not entered into any agreement to share fees.

12. JMB is being retained on an hourly basis. The hourly rates that JMB generally charges clients both in and out of bankruptcy is \$450 per hour for each of its partners. This rate is well within the wide range of rates charged in this District by firm representing debtors and other parties in chapter 11 cases.

Dated: March 11, 2019

/s/ Erin E. Jones
Erin E. Jones